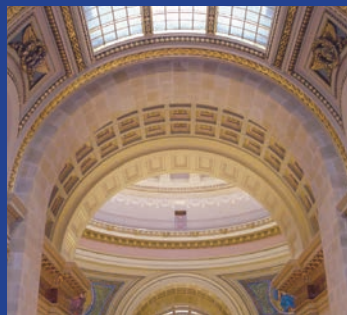


**Report 19-28
December 2019**

School Safety Grants and Plans

STATE OF WISCONSIN



Legislative Audit Bureau ■

School Safety Grants and Plans

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Appendix

Selected Documents Related to School Safety Best Practices

Response

From the Attorney General of the State of Wisconsin



STATE OF WISCONSIN | Legislative Audit Bureau

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Joe Chrisman
State Auditor

December 18, 2019

Senator Robert Cowles and
Representative Samantha Kerkman, Co-chairpersons
Joint Legislative Audit Committee
State Capitol
Madison, Wisconsin 53702

Dear Senator Cowles and Representative Kerkman:

As requested by the Joint Legislative Audit Committee, we have completed an evaluation of school safety grants and plans. As required by statutes, the Department of Justice (DOJ) administers the school safety grants and maintains the school safety plans submitted to it by public school districts, private schools, independent charter schools, and tribal schools.

DOJ awarded \$94.5 million in 1,325 school safety grants to school districts, private schools, independent charter schools, and tribal schools in 2018, and it had reimbursed grant recipients \$35.8 million as of mid-July 2019. We reviewed DOJ's files for a sample of 70 grants that totaled \$17.6 million, or 18.6 percent of the total amount of all grants awarded. We found that DOJ appropriately administered and oversaw these 70 grants.

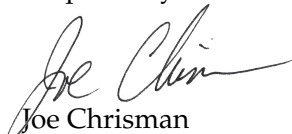
We reviewed all 779 school safety plans that school districts, private schools, and independent charter schools had submitted to DOJ as of mid-April 2019. We found that most of the plans contained information about at least six of the seven types of school safety guidelines and procedures required by statutes, but that a number of plans contained relatively little information pertaining to certain guidelines and procedures.

To determine best practices for school safety, we reviewed DOJ's online resources and documents from around the nation. Our review of all 779 school safety plans found a number of examples of best practices.

We surveyed 1,210 administrators of all school districts, private schools, independent charter schools, and tribal schools, as well as 521 local law enforcement agencies, about school safety issues. Most school administrators who responded indicated they were satisfied with the cooperation received from external entities when they created their school safety plans and with their school safety grants. Local law enforcement agencies that responded indicated that they were more satisfied with various aspects of school safety at school districts than at private schools.

We appreciate the courtesy and cooperation extended to us by DOJ. A response from the Attorney General of the State of Wisconsin follows the Appendix.

Respectfully submitted,


Joe Chrisman
State Auditor

JC/DS/ss

Report Highlights ■

In 2018, DOJ awarded \$94.5 million in 1,325 school safety grants to school districts, private schools, independent charter schools, and tribal schools.

We reviewed 779 school safety plans submitted to DOJ and found that most contained information about seven types of statutorily required guidelines and procedures.

The 779 school safety plans contained a number of best practices for school safety.

Most school administrators who responded to our survey indicated that they were satisfied with the school safety grants and training provided by DOJ.

2017 Wisconsin Act 143, which was enacted in March 2018, created the Office of School Safety in the Department of Justice (DOJ). Act 143 appropriated \$100.0 million to DOJ in fiscal year (FY) 2018-19 for awarding school safety grants to school districts, private schools, independent charter schools, and tribal schools. All school districts and schools in Wisconsin, other than virtual schools, were eligible for these grants.

School districts and private schools were statutorily required to create school safety plans before enactment of Act 143. However, Act 143 requires them to include additional information in their plans and to submit copies of these plans to DOJ before January 1, 2019, and then before every January 1 thereafter. As of mid-April 2019, 61.5 percent of school districts, private schools, and independent charter schools had submitted a total of 779 school safety plans to DOJ.

To complete this evaluation, we:

- analyzed DOJ's administration and oversight of school safety grants;
- reviewed all 779 school safety plans submitted to DOJ as of mid-April 2019 and determined the extent to which these plans contained information on several key statutory requirements and contained best practices for school safety; and
- surveyed all school districts, private schools, independent charter schools, and tribal schools, as

well as local law enforcement agencies in Wisconsin, about their opinions regarding school safety issues.

School Safety Grants

All school districts and schools in Wisconsin, other than virtual schools, were eligible to apply for school safety grants. In 2018, DOJ awarded \$94.5 million in 1,325 school safety grants to school districts, private schools, independent charter schools, and tribal schools. DOJ awarded at least one grant to 99.5 percent of school districts, approximately 49.9 percent of private schools, 50.0 percent of independent charter schools, and 100.0 percent of tribal schools. As of mid-July 2019, DOJ had reimbursed grant recipients \$35.8 million. Most of the grants remained open at the time of our audit.

DOJ plans to spend the remaining \$5.5 million appropriated through Act 143 to support other school safety initiatives, such as providing grants for adolescent mental health training.

Information about how individual school districts and schools intended to use their school safety grants was not readily available. Therefore, we reviewed DOJ's files and determined this information for a sample of 70 grants of the 1,325 grants awarded. These 70 grants totaled \$17.6 million, or 18.6 percent of the total amount of all grants awarded.

Our file review found that almost one-half of the amount awarded to the school districts and schools in our sample was for surveillance and screening items, such as electronic door locks for monitoring or controlling access to schools, school visitor management and screening systems, and video surveillance and video intercom systems. We found that DOJ appropriately administered and oversaw the 70 grants in our file review.

School Safety Plans

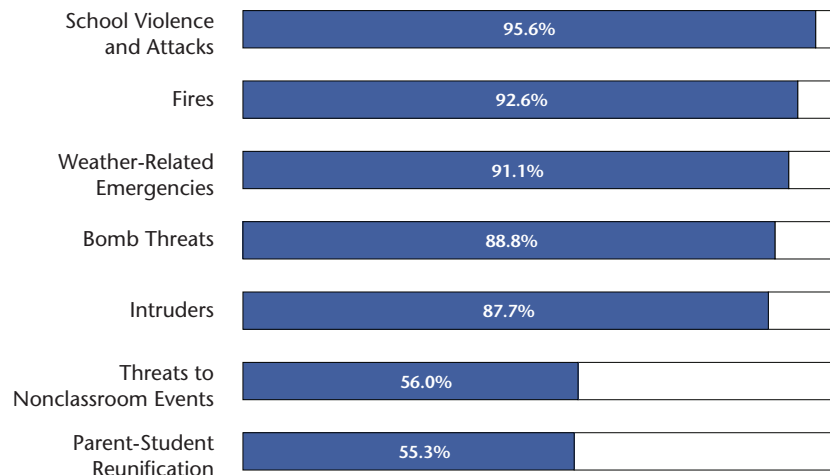
As of mid-April 2019, 61.5 percent of school districts, private schools, and independent charter schools had submitted a total of 779 school safety plans to DOJ. The 779 plans included those submitted by:

- 333 of 421 school districts (79.1 percent);
- 438 of 819 private schools (53.5 percent); and
- 8 of 26 independent charter schools (30.8 percent).

Statutes require each school safety plan to include information on seven types of guidelines and procedures. As shown in Figure 1, we found that more than 85.0 percent of the 779 school safety plans contained information on guidelines and procedures for school violence and attacks, fires, weather-related emergencies, bomb threats, and intruders. Slightly more than one-half contained information on guidelines and procedures for threats to nonclassroom events and parent-student reunification. Many school safety plans contained relatively little information pertaining to threats to nonclassroom events and parent-student reunification.

Figure 1

Extent to Which School Safety Plans Contained Information on Seven Types of Statutorily Required Guidelines and Procedures¹



¹ Includes 779 school safety plans submitted to DOJ as of mid-April 2019.

Statutes require school safety plans to contain an individualized safety plan for each school building and facility that is regularly occupied by students. Our review of the 779 plans found that 735 plans (94.4 percent) contained individualized safety plans for all school buildings and facilities.

Upon creating a school safety plan, statutes require school districts and private schools to submit copies of the most-recent blueprints of each school building and facility to DOJ. Our review found that blueprints had been submitted by 328 of 421 school districts (77.9 percent), 439 of 819 private schools (53.6 percent), and 8 of 26 independent charter schools (30.8 percent).

Best Practices

To determine best practices for school safety, we reviewed DOJ's online resources and documents from around the nation. To identify examples of best practices for school safety, we reviewed all 779 school safety plans and related documents that school districts, private schools, and independent charter schools had submitted to DOJ as of mid-April 2019. Our review found that the plans contained a number of best practices pertaining to emergency prevention and mitigation, emergency preparedness, emergency response, and emergency recovery.

Statutes require school districts and private schools to:

- conduct on-site safety assessments of school facilities, in consultation with local law enforcement agencies, before creating or updating a school safety plan;
- annually conduct at each school building that is regularly occupied by students at least one drill in the proper response to a school violence event, in accordance with the school safety plan in effect for a given school building; and
- submit school building blueprints to local law enforcement agencies and DOJ.

We reviewed the safety assessments, drill evaluations, and school building blueprints submitted to DOJ. We found a number of best practices in these documents.

Opinions

We surveyed 1,210 administrators of all school districts, private schools, independent charter schools, and tribal schools, as well as 521 local law enforcement agencies, about school safety issues. A total of 427 administrators (35.3 percent) and 331 local law enforcement agencies (63.5 percent) responded to our two surveys. Most school administrators who responded indicated they were satisfied with the cooperation they received from external entities when they created school safety plans and with the school safety grants and the training provided by DOJ. However, most school administrators who responded also indicated that they had unmet school safety needs.

Local law enforcement agencies that responded to our survey indicated that they were more satisfied with various aspects of school safety at school districts than at private schools. Most law enforcement agencies that responded indicated that they had obtained school safety plans and school building blueprints from school districts and private schools.

Recommendation

We recommend that DOJ use the results of our surveys to consider ways to provide school districts and schools with additional training and support pertaining to school safety issues and report to the Joint Legislative Audit Committee by April 24, 2020, on its efforts to implement this recommendation (*p. 64*).

Issues for Legislative Consideration

The Legislature could consider modifying statutes to:

- require independent charter schools to develop school safety plans and submit them to DOJ (*p. 26*);
- require school safety plans to be submitted to DOJ every three years (*p. 26*); and
- require DOJ to annually review a sample of the school safety plans and provide school districts and schools with guidance on complying with statutes and improving their plans (*p. 26*).

■ ■ ■ ■

Introduction ■

2009 Wisconsin Act 309, which was enacted in May 2010, required each school district and private school to have a school safety plan in effect within three years of May 2010. Act 309 required a plan to include general guidelines that specified procedures for emergency prevention and mitigation, preparedness, response, and recovery. Act 309 also required a plan to be created with the participation of local law enforcement officers, firefighters, school administrators, teachers, school counselors, school social workers, school psychologists, school nurses, mental health professionals, and other appropriate parties, as determined by each school district and private school.

2017 Wisconsin Act 143 modified the requirements for school safety plans.

2017 Wisconsin Act 143 modified the requirements for school safety plans. Before creating or updating its plan, a school district or private school must, in consultation with a local law enforcement agency, conduct an on-site safety assessment of each school building, site, and facility that is regularly occupied by students. A plan must be created with the active participation of appropriate parties, which are determined by a school district or a private school and may include DOJ, local law enforcement officers, firefighters, school administrators, teachers, school counselors, school social workers, school psychologists, school nurses, and mental health professionals.

Statutes require a school safety plan to include:

- an individualized safety plan for each school building regularly occupied by students;

- general guidelines that specify procedures for emergency prevention and mitigation, preparedness, response, and recovery;
- guidelines and procedures to address school violence and attacks, threats of school violence and attacks, bomb threats, fires, weather-related emergencies, intruders, parent-student reunification, and threats to nonclassroom events such as recess and extracurricular activities; and
- the process for reviewing the methods for conducting drills required to comply with the plan.

Statutes require each school district and private school to determine the individuals who must receive school safety plan training and the frequency of such training. Such training must be based on the prioritized needs, risks, and vulnerabilities of the school district or private school. Statutes also require each school district and private school to ensure that students are drilled at least annually in the proper response to a school violence event in accordance with the plan for the particular buildings they regularly occupy.

Before January 1, 2019, and before each January 1 thereafter, statutes require each school district and private school to submit to DOJ a copy of its school safety plan.

Before January 1, 2019, and before each January 1 thereafter, statutes require each school district and private school to submit to DOJ:

- a copy of its school safety plan;
- the date of the statutorily required annual drill for responding to a school violence event;
- certification that a school board or governing body of a private school reviewed the written evaluation of the drill;
- the date of the most-recent training on school safety and the number of training attendees;
- the most-recent date on which the school board or governing body of a private school reviewed and approved the plan; and
- the most-recent date on which the school board or governing body of a private school consulted with local law enforcement to conduct the on-site safety assessments.

Each school board and governing body of a private school is statutorily required to review and approve its school safety plan at least once every three years. In addition, each school district and private school must submit copies of its most-recent blueprints of all school buildings and facilities to DOJ and to each local law enforcement agency with jurisdiction over it.

Act 143 created the Office of School Safety in DOJ, authorized 1.0 full-time equivalent staff position, and requires the Office to:

- create model practices for school safety in conjunction with the Department of Public Instruction (DPI) and by consulting the Wisconsin School Safety Coordinators Association and the Wisconsin Safe and Healthy Schools Training and Technical Assistance Center;
- compile from school districts and private schools the blueprints and maps of all school buildings and facilities; and
- provide school safety training to school staff or contract with a third party to provide this training.

Act 143 appropriated \$100.0 million to DOJ to award grants to school districts, private schools, independent charter schools, and tribal schools for improving school safety.

Act 143 appropriated \$100.0 million in general purpose revenue to DOJ to award grants to school districts, private schools, independent charter schools, and tribal schools for improving school safety. Statutes require these grants to be used to cover the costs of:

- complying with the model practices for school safety created by DOJ;
- the school safety training provided by DOJ or a contracted third party;
- safety-related upgrades to school buildings, equipment, and facilities; and
- developing school building blueprints.

Statutes require DOJ to annually submit to the co-chairpersons of the Joint Committee on Finance a report on the amount of grants that were awarded and how the grants were spent. In May 2019, DOJ submitted its first annual report, which provided summary information on the amount of grants awarded and the amount it had reimbursed recipients for eligible school safety-related expenses. In its report, DOJ indicated that it had insufficient staff to provide more

detailed information on how recipients planned to use their grants, and that it had concerns about providing information that could compromise school safety, such as by revealing how a given school planned to use its grant to improve security.

To complete this evaluation, we interviewed DOJ and DPI staff, contacted 24 organizations involved with issues pertaining to school safety grants and plans, reviewed information compiled by DOJ and other organizations about best practices for school safety, and attended school safety-related training sessions provided by DOJ. We examined DOJ's information for a sample of 70 grants, which totaled \$17.6 million and represented 18.6 percent of the total amount of all 1,325 grants awarded. In doing so, we examined the grant applications and reimbursement requests submitted by school districts and schools. We reviewed all 779 school safety plans submitted to DOJ by school districts, private schools, and independent charter schools as of mid-April 2019. In addition, we surveyed 1,210 administrators of all school districts, private schools, independent charter schools, and tribal schools, as well as 521 local law enforcement agencies, about their opinions regarding the school safety grants and plans.

■ ■ ■ ■

School Safety Grants ■

DOJ awarded \$94.5 million in school safety grants and reimbursed grant recipients \$35.8 million as of mid-July 2019.

DOJ awarded 1,325 school safety grants totaling \$94.5 million to school districts, private schools, independent charter schools, and tribal schools in 2018. All school districts and schools in Wisconsin, other than virtual schools, were eligible for these grants, which were funded from the \$100.0 million appropriated to DOJ by 2017 Wisconsin Act 143. As of mid-July 2019, DOJ had reimbursed grant recipients \$35.8 million. Most of the grants remained open at the time of our audit. We reviewed DOJ's files for a sample of 70 grants, including 25 grants that we randomly selected in each round of funding and the 5 largest grants and the 5 smallest grants in each round. These 70 grants totaled \$17.6 million, or 18.6 percent of the total amount of the 1,325 grants awarded. Enrollment at the school districts and schools that received these 70 grants ranged from 30 students to 75,539 students. We found that DOJ appropriately administered and oversaw these 70 grants.

Grant Administration

DOJ awarded the \$94.5 million in school safety grants through two rounds, including:

- 723 grants totaling \$48.5 million in round 1, to be used for eligible school safety expenses incurred from June 2018 through August 2019; and
- 602 grants totaling \$46.0 million in round 2, to be used for eligible school safety expenses incurred from October 2018 through August 2020.

DOJ plans to spend the remaining \$5.5 million appropriated through Act 143 to support other school safety initiatives, such as providing grants to school districts and schools in order to train employees on adolescent mental health issues. In addition, it plans to use funds to provide crisis response assistance to school districts that experience a critical incident and have insufficient resources to respond adequately.

DOJ required school safety grant applicants to meet certain criteria, including locking all school entrances during the school day, designating employees to visually screen everyone entering schools, and having written visitor protocols. Before the end of the 2018-19 school year, DOJ also required applicants to provide all full-time teachers, aides, counselors, and administrators with at least three hours of training in adverse childhood experiences, which include abuse or neglect, and trauma-informed care, which recognizes the effects of adverse childhood experiences and provides students with the support necessary to meet their unique needs. Applicants were also required to provide DOJ with existing school safety plans, blueprints of school buildings, and letters of support from local law enforcement agencies. Applicants for round 2 grants were required by August 31, 2019, to establish a school safety intervention team and send 10.0 percent of full-time teachers and counselors to a 12-hour DOJ-approved adolescent mental health training program.

In round 1, DOJ allowed school districts and schools to apply for grants to cover the costs of primary security and advanced security items. Primary security items included the purchase and installation of locks on classroom doors without locks and the purchase and installation of shatter-resistant film for glass doors and certain adjacent windows of the main school entrance. Advanced security items included the purchase and installation of upgraded locks for classroom doors, locks on other interior doors, and shatter-resistant film for glass doors and certain adjacent windows of school entrances other than the main entrance. Advanced security items also included the costs of school employees to attend certain school safety training sessions, visitor screening systems, systems to notify law enforcement agencies about emergencies, intra-facility emergency communication systems, security cameras, exterior door alarms, school safety signs, fences and gates, video intercom systems, and the creation and updating of school blueprints and school safety plans in order to comply with statutory requirements.

In round 1, DOJ did not limit the grant amounts for eligible primary security items, but it limited advanced security grants to \$20,000 per school building. Grants could not be used to purchase weapons, body armor, or bulletproof glass.

In round 2, DOJ allowed grants to be used to cover the costs of any item covered by round 1 grants, as well as for additional training expenses, such as lodging, meals, overtime pay, and substitute teachers. Each school district and school was eligible for between \$10,000 and \$2.5 million, depending on the number of enrolled students.

DOJ awarded at least one school safety grant to 99.5 percent of school districts, approximately 49.9 percent of private schools, 50.0 percent of independent charter schools, and 100.0 percent of tribal schools.

As shown in Table 1, DOJ awarded at least one grant to 99.5 percent of school districts, approximately 49.9 percent of private schools, 50.0 percent of independent charter schools, and 100.0 percent of tribal schools. DOJ did not award grants to two applicants that submitted complete applications. The first applicant was a private preschool, and the second was a private school that did not intend to enroll students in the 2018-19 school year. Preschools were ineligible for grants if they did not also teach elementary students.

Table 1

School Safety Grant Recipients, by Type
Includes Recipients of Both Rounds of Grants

Type of Recipient	Recipients	Total Recipient Type	Recipients as a Percentage of Total Recipient Type
School Districts	419	421	99.5%
Private Schools ¹	427	856	49.9
Independent Charter Schools	13	26	50.0
Tribal Schools	3	3	100.0
Non-District Public Schools ²	2	4	50.0
Total	864	1,310	66.0

¹ Estimated, in part, because some private schools collectively applied for and received grants that were then shared with an unknown number of individual private schools.

² Public schools that were operated by counties or DPI and were not part of school districts.

Information about how individual school districts and schools intended to use their school safety grants was not readily available. Therefore, we reviewed DOJ’s files and determined this information for a sample of 70 grants. Our review of:

- round 1 grant recipients included 18 school districts, 16 private schools, and 1 public school that was not part of a school district, which were located in 22 counties; and

- round 2 grant recipients included 21 school districts and 14 private schools, which were located in 26 counties.

Our file review of 70 school safety grants included \$8.6 million in round 1 grants and \$9.0 million in round 2 grants.

As shown in Table 2, our file review of 70 school safety grants included \$8.6 million in round 1 grants (17.7 percent of the \$48.5 million that DOJ awarded in round 1) and \$9.0 million in round 2 grants (19.6 percent of the \$46.0 million that DOJ awarded in round 2).

Table 2

File Review of School Safety Grants: Amounts Awarded
70 Grants Reviewed

	School Districts ¹	Private Schools	Total
Round 1			
Advanced Security Funding	\$ 7,985,000	\$248,000	\$ 8,233,000
Primary Security Funding	394,900	4,300	399,200
Subtotal	8,379,900	252,300	8,632,300
Round 2			
	8,763,900	220,900	8,984,800
Total	\$17,143,800	\$473,300	\$17,617,100

¹ Round 1 included one public school that was not part of a school district.

Our file review found that almost one-half of the total amount awarded to school districts and schools in our sample was for surveillance and screening items.

As shown in Table 3, our file review found that almost one-half of the total amount awarded to school districts and schools in our sample was for surveillance and screening items, such as electronic door locks for monitoring or controlling access to schools, school visitor management and screening systems, and video surveillance and video intercom systems. Other amounts were awarded for:

- interior door locks and lock upgrades;
- communication and information systems, including telephone systems, public address systems, two-way radios, panic buttons, incident command materials, parent-student reunification materials, and school safety signs;
- training, including course registration, materials, travel, and paying substitute teachers;

- structural and exterior improvements, including relocating or remodeling entrances, fences and gates, and non-electronic exterior door locks;
- shatter-resistant film on exterior glass doors; and
- school blueprints and safety plans, including creating or updating these documents to comply with statutory requirements.

Table 3

File Review of School Safety Grants: Purpose of the Grants
70 Grants Reviewed

Purpose	Amount	Percentage of Total
Surveillance and Screening	\$ 8,687,300	49.3%
Interior Door Locks	2,686,200	15.2
Communication and Information Systems	2,451,300	13.9
Training ¹	1,479,000	8.4
Structural and Exterior Improvements	1,212,900	6.9
Shatter-Resistant Film	806,400	4.6
School Blueprints and Safety Plans	35,800	0.2
Other ²	258,200	1.5
Total	\$17,617,100	100.0%

¹ A total of \$1.3 million was related to mental health training.

² Includes items such as first-aid kits, lockdown shades, and safety vests.

Grant Oversight

DOJ requires grant recipients to submit quarterly reimbursement requests, which must include an invoice listing each expense. DOJ reviews these reimbursement requests, in part, to ensure that recipients requested appropriate reimbursement amounts. DOJ also requires recipients to submit annual reports on the progress made towards achieving the goals of their grants, such as purchasing and installing school safety equipment and sending school employees to school safety training courses. DOJ reimbursed grant recipients \$35.8 million as of mid-July 2019.

DOJ reimbursed \$5.1 million to the school districts and schools in our sample as of mid-July 2019.

As shown in Table 4, DOJ reimbursed \$5.1 million to the school districts and schools in our sample as of mid-July 2019. This amount was 29.0 percent of the \$17.6 million awarded to these school districts and schools. Almost one-half of the total amount reimbursed was for surveillance and screening items.

Table 4

File Review of School Safety Grants: Amounts Reimbursed as of Mid-July 2019
70 Grants Reviewed

Purpose	Amount	Percentage of Total
Surveillance and Screening	\$2,529,500	49.3%
Interior Door Locks	1,032,500	20.1
Communication and Information Systems	523,200	10.2
Shatter-Resistant Film	474,100	9.2
Training ¹	372,600	7.3
Structural and Exterior Improvements	77,100	1.5
School Blueprints and Safety Plans	17,900	0.3
Other ²	105,500	2.1
Total	\$5,132,400	100.0%

¹ A total of \$291,000 was related to mental health training.

² Includes items such as first-aid kits, lockdown shades, and safety vests.

We reviewed the quarterly reimbursement requests that the school districts and schools in our sample had submitted to DOJ and the available information pertaining to DOJ's review of these reimbursement requests. We found that these school districts and schools had submitted invoices that supported their reimbursement requests. However, we found that DOJ reimbursed two grant recipients a total of \$3,500 for expenditures that these two recipients had made before being awarded their grants. After we informed DOJ of our finding, DOJ required these two recipients to return the funds.

We also reviewed the annual progress reports submitted by the school districts and schools in our sample. We found that 94.3 percent of those that were awarded round 1 grants and 88.6 percent of those that were awarded round 2 grants reported being on track to meet their grant goals. School districts and schools that reported not being on track most commonly cited delays in the installation of grant-funded items. As of July 1, 2019, 4 of the

70 grants were closed, which indicates that the recipients had received their final grant payments.

■ ■ ■ ■

School Safety Plans ■

We reviewed all 779 school safety plans that school districts and schools had submitted to DOJ as of mid-April 2019.

2017 Wisconsin Act 143 required school districts and private schools to submit copies of their school safety plans to DOJ by January 1, 2019. We reviewed all 779 school safety plans that school districts, private schools, and independent charter schools had submitted to DOJ as of mid-April 2019. We found that most of these plans contained information about at least six of the seven types of statutorily required guidelines and procedures, as well as individualized safety plans for all school buildings. We also found that most school districts and schools submitted blueprints of school buildings. However, we found that a number of plans contained relatively little information pertaining to two types of guidelines and procedures. We provide several issues for legislative consideration to improve safety in all schools.

As of mid-April 2019, 61.5 percent of school districts and schools had submitted school safety plans to DOJ.

As of mid-April 2019, 61.5 percent of school districts, private schools, and independent charter schools had submitted school safety plans to DOJ. The 779 plans included those submitted by:

- 333 of 421 school districts (79.1 percent);
- 438 of 819 private schools identified by DOJ (53.5 percent); and
- 8 of 26 independent charter schools (30.8 percent).

We found that school districts and private schools with higher enrollments were more likely than school districts and private schools with lower enrollments to have submitted school safety plans to DOJ.

Guidelines and Procedures

Statutes require each school safety plan to include information on seven types of guidelines and procedures: school violence and attacks; bomb threats; fires; weather-related emergencies; intruders; parent-student reunification after an emergency; and threats to nonclassroom events, including recess, concerts and other performances, athletic events, and any other extracurricular activity or event. Statutes do not indicate the amount or specific pieces of information that a plan should include for any of the seven types of guidelines and procedures.

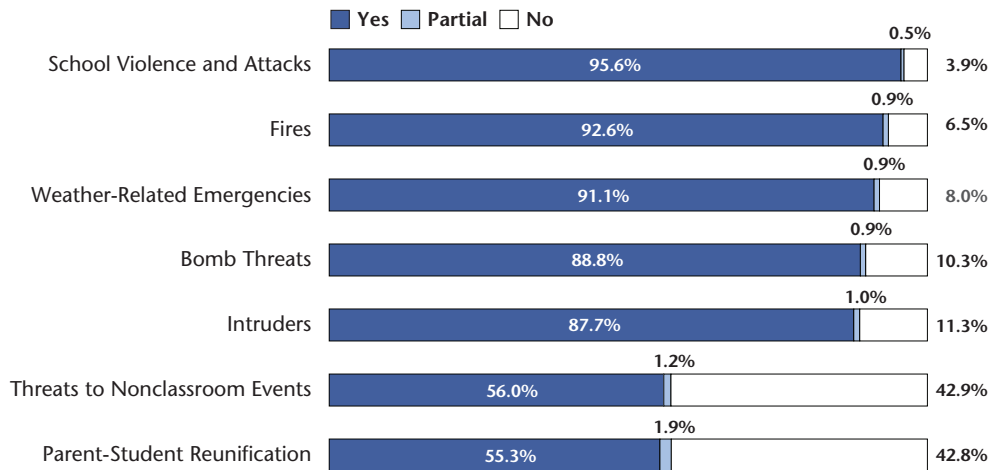
We determined whether each of the 779 school safety plans contained information on each of the seven types of guidelines and procedures. We determined that a given plan contained information on a given type of guideline and procedure as long as it contained at least one piece of relevant information. If a given plan described how a guideline and procedure applied to only some, but not all, of the schools in a school district or consortium of private schools, we concluded that it contained partial information.

Most school safety plans we reviewed contained information on seven types of statutorily required guidelines and procedures.

As shown in Figure 2, we found that more than 85.0 percent of the 779 school safety plans we reviewed contained information on guidelines and procedures for school violence and attacks, fires, weather-related emergencies, bomb threats, and intruders. Slightly more than one-half of the 779 plans contained information on guidelines and procedures for threats to nonclassroom events and parent-student reunification.

Figure 2

Extent to Which School Safety Plans Contained Information on Seven Types of Statutorily Required Guidelines and Procedures¹



¹ Includes all 779 school safety plans submitted to DOJ as of mid-April 2019.

We found that similar proportions of school safety plans submitted by school districts and private schools contained information on guidelines and procedures for school violence and attacks, fires, weather-related emergencies, bomb threats, and intruders. However, we found that:

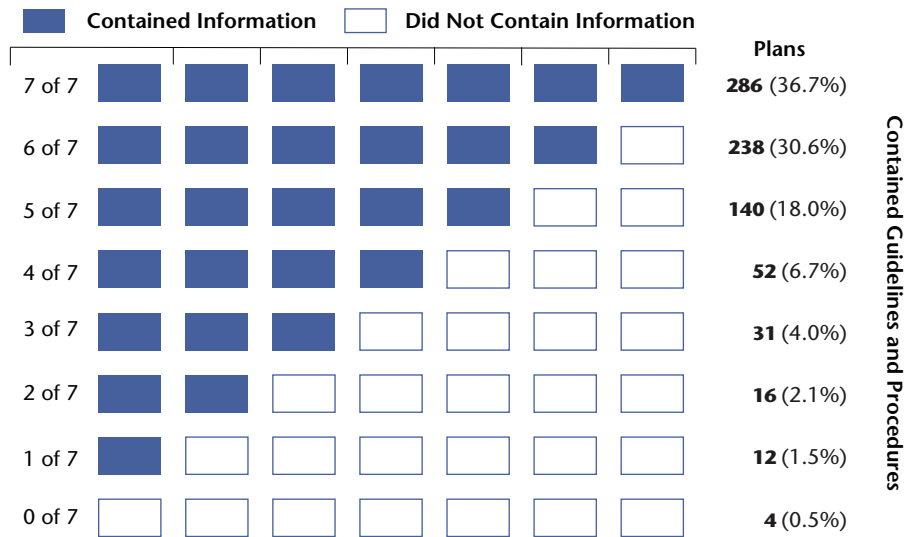
- 71.2 percent of the plans submitted by school districts but only 43.8 percent of the plans submitted by private schools contained information on guidelines and procedures for threats to nonclassroom events; and
- 64.6 percent of the plans submitted by school districts but only 48.0 percent of the plans submitted by private schools contained information on guidelines and procedures for parent-student reunification.

We also determined the extent to which each of the 779 school safety plans contained information on the seven types of guidelines and procedures. As shown in Figure 3, we found that 286 plans (36.7 percent) contained information on all seven types of guidelines and procedures, and 238 plans (30.6 percent) contained information on six of the seven types. However, 12 plans (1.5 percent) contained information on only one type of guideline and procedure, and

4 plans (0.5 percent) contained information on none of the guidelines and procedures.

Figure 3

Extent to Which Each School Safety Plan Contained Information on Seven Types of Statutorily Required Guidelines and Procedures¹



¹ Includes all 779 school safety plans submitted to DOJ as of mid-April 2019. The specific combinations of guidelines and procedures addressed in each plan varied.

Many school safety plans contained relatively little information pertaining to two types of guidelines and procedures.

Many school safety plans contained relatively little information pertaining to two types of guidelines and procedures. We found:

- 436 plans contained guidelines and procedures for threats to nonclassroom events, but at least 119 of these plans (27.3 percent) included information pertaining only to bus accidents or field trips. Statutes indicate that nonclassroom events include recess, concerts and other performances, athletic events, and any other extracurricular activity or event.
- 431 plans contained guidelines and procedures for parent-student reunification, but at least 59 of these plans (13.7 percent) contained only a few sentences of information, such as by simply identifying who would be in charge of reunification, rather than describing detailed reunification procedures.

We found that at least 10.5 percent of the school safety plans were based on templates created by organizations such as the Wisconsin Cooperative Educational Service Agency (CESA) 10 and the Wisconsin School Safety Coordinators Association. A template provides a standardized framework for creating a plan and can help to ensure that a range of threats are considered, but a template is not as useful if school officials overly rely on it and exclude unique information relevant to a given school. We found that a number of plans based on templates were not tailored to the circumstances of specific school districts or schools.

Other Requirements

Statutes require school safety plans to contain an individualized safety plan for each school building and facility that is regularly occupied by students. We determined that a given plan met the statutory requirement of being individualized as long as it contained at least one piece of individualized information for each school building. In many instances, we found emergency contact information for at least one person at each school building, a specified evacuation location for each school building, or specified roles and responsibilities for personnel in each school building. Our review of the 779 plans found that:

- 735 plans (94.4 percent) were individualized for all school buildings and facilities;
- 15 plans (1.9 percent) were partially individualized, such as by providing individualized information for only some of a given school district's or school's buildings and facilities; and
- 29 plans (3.7 percent) were not individualized.

Upon creating a school safety plan, statutes require school districts and private schools to submit copies of the most-recent blueprints of each school building and facility to DOJ. We reviewed the blueprints submitted to DOJ and found that 775 school districts, private schools, and independent charter schools submitted blueprints, including:

- 328 of 421 school districts (77.9 percent);
- 439 of 819 private schools (53.6 percent); and
- 8 of 26 independent charter schools (30.8 percent).

Legislative Considerations

The Legislature could consider modifying statutes to require independent charter schools to develop school safety plans and submit them to DOJ.

Currently, statutes require all school districts and all private schools to develop school safety plans and comply with the provisions in s. 118.07 (4), Wis. Stats., but they do not require independent charter schools to do so. The Legislature could consider modifying s. 118.07 (4), Wis. Stats., to require independent charter schools to develop school safety plans and submit them to DOJ. Statutes could also be modified to require independent charter schools to comply with other provisions in s. 118.07 (4), Wis. Stats., such as by submitting a copy of the most-recent blueprint of each school building to DOJ and the relevant local law enforcement agencies, determining the individuals who must receive school safety training, and conducting annual drills in the proper response to school violence events.

The Legislature could consider modifying statutes to require school safety plans to be submitted to DOJ every three years.

Currently, statutes require all school safety plans to be submitted before January 1 of each year, even if no changes were made to a given plan during the prior calendar year, and all school blueprints to be submitted at least once every three years after the review and approval of the school safety plans. The Legislature could consider modifying s. 118.07 (4) (e), Wis. Stats., to require school districts and schools to submit school safety plans to DOJ every three years, after the review and approval of these plans. Requiring all school safety plans to be resubmitted annually may be unnecessary.

The Legislature could consider modifying statutes to require DOJ to annually review a sample of the school safety plans.

Currently, statutes require DOJ only to collect the school safety plans. DOJ indicated that it plans to annually review a sample of plans and provide guidance to school districts and schools. The Legislature could consider modifying s. 165.28 Wis. Stats., to require DOJ to annually review a sample of the school safety plans that were submitted to it and then provide school districts and schools with guidance on complying with statutes and improving their plans. For example, such reviews could assess whether school districts and schools had complied with statutes by developing plans that were individualized for each building regularly occupied by students. Such reviews could also assess whether plans complied with statutes by containing guidelines and procedures to address school violence and attacks, bomb threats, fires, weather-related emergencies, intruders, parent-student reunification, and threats to nonclassroom events.

■ ■ ■ ■

Emergency Prevention and Mitigation
Emergency Preparedness
Emergency Response
Emergency Recovery
School Safety Assessments
School Safety Drills
School Building Blueprints
Other Considerations

Best Practices for School Safety Plans ■

To identify examples of best practices for school safety, we reviewed all 779 school safety plans and related documents that school districts and schools had submitted to DOJ as of mid-April 2019.

Identifying and communicating successful approaches to school safety that have already been implemented allows school districts and schools to learn from and consider adopting these best practices. To identify examples of best practices for school safety, we reviewed all 779 school safety plans and related documents, such as school safety assessments, that school districts, private schools, and independent charter schools had submitted to DOJ as of mid-April 2019. To determine best practices, we reviewed DOJ's March 2019 *Wisconsin Comprehensive School Security Framework*, which contains policies, procedures, and practices to guide and improve school safety. We also reviewed documents from around the nation, including the Minnesota Department of Emergency Management's *Comprehensive School Safety Guide*, the U.S. Department of Education's *Guide for Developing High-Quality School Emergency Operations Plans*, and the Federal Commission on School Safety's December 2018 report. The Appendix lists selected documents we reviewed. Our review found that the plans and related documents submitted by Wisconsin school districts and schools contained a number of best practices. In describing these best practices, we do not identify particular school districts and schools in order to avoid compromising the safety of employees and students. We distributed our report to every school district and school in Wisconsin that was in operation as of June 2019.

Table 5 lists examples of the best practices we found in our review of all 779 school safety plans and related documents that school districts and schools had submitted to DOJ as of mid-April 2019. We grouped these best practices into seven categories.

Table 5

Examples of School Safety Best Practices, by Category¹

Category	Examples
Emergency Prevention and Mitigation	Controlling access to school buildings, providing student mental health services, creating a positive school climate, and addressing specific threats
Emergency Preparedness	Posting evacuation routes and developing warning systems, training employees, and developing an incident command system
Emergency Response	Implementing the Standard Response Protocol, planning for communication during emergencies, and considering individuals who require accommodations
Emergency Recovery	Identifying key recovery steps, assigning responsibilities to specific employees, establishing post-emergency policies, and creating guidance for post-emergency communications
School Safety Assessments	Requiring individuals other than employees to complete these assessments and ensuring assessments consider the entire infrastructure of schools, school safety plans, and the technological capabilities of schools
School Safety Drills	Accounting for all students during drills, conducting drills with local law enforcement agencies or emergency responders, debriefing drill results, and writing comprehensive drill evaluations
School Building Blueprints	Ensuring blueprints indicate certain information and are well-organized and clear

¹ Examples found in our review of all 779 school safety plans and related documents submitted to DOJ as of mid-April 2019.

School safety plans can be most effective if they are well-organized and contain relevant background information. For example:

- Developing a logically ordered table of contents helps individuals locate specific information. Our review found a number of plans included tables of contents that were arranged alphabetically based on the type of emergency, contained hyperlinked page numbers, or were color-coded.
- Describing agreements with other entities helps clarify available resources, such as evacuation and parent-student reunification sites. Our review found a number of plans described such agreements, including one plan that described an agreement with a transportation company to provide buses and drivers during emergencies.
- Including contact information for key school employees, crisis team members, and emergency responders facilitates communication. Our review

found many plans included contact information for such individuals as well as for utilities, media outlets, county human services departments, and neighboring school districts and private schools that can serve as evacuation locations or provide other assistance.

- Listing relevant laws and policies establishes the legal basis for plan elements and provides additional information. Our review found a number of plans included such lists, including some with hyperlinks to policies on school district and school websites and one that referenced relevant policies in each plan section and included an appendix with all referenced policies.

Emergency Prevention and Mitigation

Best practices include controlling access to school buildings, providing student mental health services, creating a positive school climate, and addressing specific threats.

Statutes require school safety plans to include guidelines that specify procedures for emergency prevention and mitigation. Prevention guidelines help decrease the likelihood of emergencies occurring, and mitigation guidelines help minimize damage caused by emergencies that do occur. Best practices include:

- controlling access to school buildings;
- providing student mental health services;
- creating a positive school climate; and
- addressing specific threats.

Access to School Buildings

Establishing and consistently following relevant school access procedures allows employees to screen and monitor individuals entering school buildings and react quickly to emergencies. Best practices include having a single main building entrance and visually screening individuals as they enter, installing security cameras inside and outside of buildings, establishing visitor protocols that include identifying and documenting all school visitors, and keeping classroom doors locked. Our review found a number of school safety plans that addressed access to school buildings, including some plans that did so comprehensively. For example:

- One school district's plan included procedures pertaining to school visitors and volunteers,

elections held in schools, and supervising students at recess and before and after the school day. These procedures indicated that main entrances are monitored with cameras and intercoms, and specific employees are assigned responsibilities for controlling access to buildings.

- Another school district’s plan included procedures for securely receiving deliveries to school buildings. Visitors are screened using a web-based system that determines whether their names are on sex offender or restraining order registries.

Student Mental Health Services

Providing student mental health services can improve the overall climate of a school and help students more effectively address personal problems and feel more connected to the school community. Best practices include training school employees to recognize the signs of mental health issues, conducting mental health screenings of students, and referring students to a mental health specialist. Our review found a number of school safety plans that addressed student mental health services. For example:

- One school district’s plan described practices that included using free mental health screening tools to regularly assess all students. Based on the screening results, employees meet with students and parents.
- Another school district’s plan described practices that included providing suicide awareness and recognition training to all employees in direct contact with students. In response to information about a student who may be in an emotional crisis, employees meet with the student, assess the student’s suicide risk, and respond accordingly.

School Climate

A positive school climate can decrease bullying and increase the likelihood that students with information about a potential threat will report it to school employees. Best practices include adopting comprehensive anti-bullying policies that address cyberbullying, reporting and investigating bullying, training employees and

students to recognize and address bullying, providing services to bullies and their victims, and conducting surveys to assess the school climate and identify needed improvements. Our review found a number of school safety plans that included policies for creating a positive school climate. For example:

- One school district's plan contained a detailed policy describing how to define and identify bullying, student hazing, different types of harassment, and cyberbullying. This plan also described how complaints of bullying should be reported, investigated, and addressed.
- Another school district's plan described the annual school climate survey administered to students, employees, and parents. This survey measures multiple dimensions of school climate, including relationships, teaching and learning, safety, institutional environment, and family engagement.

Specific Threats

Individuals other than those who commit acts of school violence often have prior knowledge of the intended acts. Best practices include establishing a confidential tip line that is constantly monitored and creating a threat assessment team that should:

- include individuals from a variety of disciplines, such as administrators, mental health professionals, and school resource officers;
- differentiate between concerning behavior and immediately threatening behavior;
- develop standard procedures for assessing threats that include examining students identified as potential threats as well as their families, schools, and broader social dynamics; and
- implement necessary threat management procedures, such as monitoring the student, providing mental health support, and contacting law enforcement.

Our review found a number of school safety plans that included actions for addressing specific threats. For example:

- One school district’s threat assessment team is to follow a process that includes conducting an online threat assessment, determining the risk posed by a threat, creating a plan to support and monitor the student, and creating a plan to protect targeted students.
- Another school district’s plan promoted the use of its confidential tip line. Students, school employees, and community members can anonymously report incidents or unsafe behavior online, by telephone, or by a mobile application through which they can submit photos and videos and review their previously submitted reports.

Emergency Preparedness

Best practices include posting evacuation routes and developing warning systems, training employees, and developing an incident command system.

Statutes require school safety plans to include guidelines that specify procedures for emergency preparedness. Preparedness includes the process of creating a plan, deciding the actions to take in response to emergencies and those responsible for taking them, and practicing those actions. Best practices include:

- posting evacuation routes and developing warning systems in school buildings;
- training employees; and
- developing an incident command system.

School Buildings

Posting evacuation routes throughout a school allows employees and students to become familiar with them and increases the likelihood of timely and effective responses during emergencies. Our review found a number of school safety plans that indicated the elements to include in posted evacuation routes, such as the nearest exits, diagrams with primary and secondary evacuation routes, and emergency response guides. A number of plans also indicated the specific locations to post evacuation routes, such as in each room, near room exits, or at the eye level of students. One private school plan indicated that the posted evacuation routes are to be reviewed by teachers at the start of each school year.

Addressing appropriate interior and exterior warning systems in school safety plans, including the testing, placement, and use of public address systems, helps to ensure that individuals can be promptly notified in emergencies. Our review found that one school district's plan included detailed announcements for school principals to use in emergencies and described duties related to alternate means of contacting classrooms and individuals outdoors.

Training

If an emergency occurs, it is important for school employees to be trained to help individuals in need until first responders arrive, and to be aware of those employees who have completed first-aid training. It is a best practice for school safety plans to include the names of employees trained in first-aid procedures and the expectations for such training. Our review found a number of plans listed the names, positions, locations, and telephone numbers of employees certified in first-aid procedures. One school district's plan also included the expiration dates of each employee's CPR certification and the locations of automated external defibrillators.

Incident Command System

An incident command system, which assigns the roles to perform during emergencies to specified employees with appropriate skills and identifies alternate employees for each role, can provide structure to school preparedness and response procedures. Our review found a number of school safety plans described such systems. Some plans used organizational flowcharts to display the names and telephone numbers of primary and alternate employees and outlined the specific responsibilities of employees. One school district's plan also described its system on a district and individual school level.

Emergency Response

Best practices include implementing the Standard Response Protocol, planning for communication during emergencies, and considering individuals who require accommodations.

Statutes require school safety plans to include general guidelines that specify procedures for emergency response, as well as guidelines and procedures to address specific safety-related events, such as intruders, threats to nonclassroom events, and parent-student reunification. Following response guidelines and procedures helps school districts and schools effectively manage emergencies and protect individuals within school buildings. Best practices include:

- implementing the Standard Response Protocol, which was developed by a non-profit organization and describes actions for responding to emergencies;

- planning for communication during emergencies; and
- considering individuals who require accommodations.

Our review found a number of plans included procedures for addressing specific safety-related events. For example:

- One private school's plan included graduated responses for intruders, based on the perceived severity of a given threat. When encountering an unauthorized individual in a school, employees are to assess the individual and escort the individual to the main office. If the individual appears to pose a threat or refuses to be escorted, employees are to run to safety, call 911, and initiate a school lockdown using an all-school announcement.
- Another private school's plan included a chain of command for responding to various nonclassroom emergencies and identified on-site leaders, such as the athletic director at sporting events, teachers at recess, and the director at school plays. On-site leaders determine whether to call 911, instruct others how to help, and stay with any victims until emergency responders arrive.
- One school district's plan included parent-student reunification guidelines, such as printed reunification forms to confirm the identity of parents and guardians, and detachable sheets to inform school employees of their duties during emergencies.

Standard Response Protocol

The Standard Response Protocol incorporates consistent, clear language and includes four primary actions that can be taken during emergencies, including:

- lockdown, to be used for indoor threats, such as intruders, and involves locking classroom doors, moving out of sight, turning off lights, and maintaining silence to minimize detection;
- lockout, to be used for outdoor threats, such as a criminal activity in the neighborhood, and involves bringing students indoors and locking entrances;

- evacuation, to be used when hazardous situations require moving students and employees outdoors, such as a fire or bomb threat; and
- shelter in place, to be used when external hazardous situations, such as tornadoes, require moving to the safest nearby location for personal protection.

Our review found a number of school safety plans that incorporated Standard Response Protocol actions. For example:

- Multiple plans included guidelines emphasizing that students and employees in a lockdown should exit rooms only after law enforcement personnel unlock doors.
- Multiple plans included evacuation guidelines that showed maps of designated off-site destinations at community locations. A number of plans referenced agreements made with local places of worship or community centers to serve as rally points during evacuations and included predetermined meeting locations organized by grade level.
- One school district's plan included shelter-in-place guidelines for taking attendance, ensuring a constant employee presence, and managing medication, hydration, and restroom needs during extended sheltering. A number of plans included procedures for securing air circulation equipment and sealing doors and windows during external hazardous materials incidents.

Emergency Communications

Schools use a variety of methods to communicate emergency information internally and to first responders, parents, and the media, including public address systems, two-way radios, telephones, and web applications. It is a best practice for school safety plans to describe the methods and systems for emergency communications, including how to notify different entities and communicate with the media. Our review found:

- One private school's plan included two-way radio guidelines, such as radio locations, channels to use during and after school hours, and radio assignments for employees.

- One school district’s plan included guidelines for using a web application to communicate by telephone, email, or text with teachers, students, and parents, as well as a template for emergency announcements.
- Another school district’s plan included guidelines for a third-party notification system that can transmit a message to law enforcement, activate lights or sirens in school buildings, broadcast warnings for a lockdown over the public address system and through computer networks, trigger door controls, and display camera views on a closed-circuit television system.
- Another private school’s plan identified the principal or pastor as the media liaison and included a template for releasing information publicly.

Individuals Requiring Accommodations

It is a best practice for school safety plans to consider how emergency response guidelines may need to be adapted to accommodate individuals with special needs or limited English proficiency. Such individuals may require additional assistance in hearing, interpreting, or responding to emergency alert notifications. Our review found a number of plans considered accommodations for such individuals. For example:

- One school district’s plan described specific actions to be taken for individuals with special needs, such as communicating response actions in an appropriate manner or arranging for transportation in a vehicle equipped to meet the needs of these individuals. This plan included a roster of individuals with special needs in each school building.
- A second school district’s plan included guidelines and a checklist for determining whether a student needs an individual evacuation plan, as well as a template for creating such a plan. This template identifies necessary specialized equipment and behavioral supports that may be needed as well as student-specific response plans for different scenarios.

- A third school district’s plan provided guidance for situations where immediate communication must occur in Spanish and a list of bilingual employees and their telephone numbers. For languages other than Spanish, the school district sponsors a “language line” that can be called for translation assistance.

Emergency Recovery

Best practices include identifying key recovery steps, assigning responsibilities to specific employees, establishing post-emergency policies, and creating guidance for post-emergency communications.

Statutes require school safety plans to include guidelines that specify procedures for emergency recovery. Such procedures help school districts and schools to resume their normal education and business functions as quickly as possible after emergencies, and to communicate with a variety of stakeholders quickly and efficiently. Best practices include:

- identifying key recovery steps;
- assigning responsibilities to specific employees;
- establishing post-emergency policies; and
- creating guidance for post-emergency communications.

Key Recovery Steps

Identifying the key recovery steps that should be taken after an emergency helps promote efficient recovery and ensures that important steps occur. Our review found:

- One public school’s plan identified the immediate actions to take after an emergency, including convening a crisis response team, verifying information about an emergency, keeping employees informed, and designating one employee as the contact for obtaining information about a given emergency.
- One private school’s plan identified the need to assign specific responsibilities to employees, prepare communications to students and parents, and establish a safe room where students can work in a quiet and comfortable setting and receive counseling services.

Employee Responsibilities

Assigning responsibilities to specific school employees before emergencies occur can streamline the recovery process and reduce confusion after emergencies. It is a best practice for school safety plans to assign such responsibilities and create guidelines or checklists to ensure that the appropriate employees take identified recovery actions. Our review found:

- One school district's plan assigned tasks to the superintendent, principals, teachers, and others in order to ensure the restoration of academic and business operations and physical facilities, and to provide emotional support and resources.
- One private school's plan assigned specific responsibilities to employees, such as evaluating existing resources, determining if business functions should be re-established at the existing campus or another location, adapting learning activities to post-incident circumstances, and developing post-crisis debriefing and counseling sessions for students.

Post-Emergency Policies

Establishing key post-emergency policies before emergencies occur and including such policies in school safety plans allows school employees to address certain unfamiliar situations in a consistent and transparent manner. Our review found:

- One school district's plan contained policies and procedures regarding memorials and interactions with the media after the death of a student or employee.
- One private school's plan contained policies and procedures for interacting with the media after emergencies.

Post-Emergency Communications

Including guidance in school safety plans for post-emergency communications with students, school employees, parents, and the media, such as by creating template letters and announcements, helps school administrators communicate important information in a timely manner. Our review found:

- One school district’s plan provided an outline for classroom discussions after emergencies and guidelines for training employees to conduct such discussions. This plan provided templates for communications to employees, parents, and the media for incidents such as a school evacuation or lockdown.
- One private school’s plan provided sample letters to parents and statements for teachers to read after the death of a student or employee.

School Safety Assessments

Best practices include requiring individuals other than employees to complete school safety assessments and ensuring assessments consider the entire infrastructure of schools, school safety plans, and the technological capabilities of schools.

Statutes require school districts and private schools to conduct on-site safety assessments of school facilities, in consultation with local law enforcement agencies, before creating or updating school safety plans. Statutes require such assessments to include each school building, site, facility, and property regularly occupied by students, including playgrounds and athletic facilities and fields. We reviewed the assessments submitted to DOJ. Best practices include:

- requiring individuals other than employees to complete the assessments;
- ensuring assessments consider the entire infrastructure of schools;
- ensuring assessments consider school safety plans; and
- ensuring assessments consider the technological capabilities of schools.

Conducting school safety assessments with individuals other than school employees can help prevent inaccurate assumptions and automatic acceptance of past practices because such individuals are more likely than employees to be objective. A number of school safety plans indicated that local law enforcement officers had conducted such assessments. One school district indicated that an insurance company risk expert conducted its assessment.

Considering the entire infrastructure of schools, including the exteriors, identifies options for preventing and protecting against incidents and helps prioritize security improvements. Our review found that the assessments completed by several school districts included walkthroughs and photographs of areas that needed security improvements. These assessments considered the security

of school interiors, including exit signs, interior lighting, entrance lobbies, systems for signing individuals in and out of schools, hallways, restrooms, classrooms, cafeterias, gymnasiums, auditoriums, athletic buildings, mechanical rooms, and custodial closets. These assessments also considered school exteriors and perimeters, including fencing, outdoor lighting, landscaping, signage, doors, windows, security alarm systems, portable classrooms, parking lots, and traffic flows.

Considering a school safety plan ensures that appropriate measures exist for addressing the safety of students, school employees, facilities, and property. Our review found that the assessments completed by several school districts and private schools determined whether their schools had current safety plans approved by school boards or governing bodies. These assessments also determined whether safety plans required background checks of all employees and volunteers, annual training for employees on the plans, and specific procedures for responding to hazards in all facilities and on field trips.

The ability to quickly detect threats and share accurate, real-time information with necessary parties helps schools mitigate and respond to emergencies. It is a best practice for a school safety assessment to consider a school's communications capabilities (such as two-way radios and public address systems), monitoring capabilities (such as camera systems), and other technological capabilities (such as keys and identification systems), as well as procedures for utilizing these capabilities. Our review found the assessments completed by one school district and one private school determined whether their schools had public address systems, two-way communication between main offices and classrooms and other rooms, telephones or other methods to call 911, regular communication with parents, and procedures for reporting threats and communicating security instructions. These assessments also determined if security cameras were appropriately placed and regularly monitored, specific employees were designated to secure buildings after school activities, photo identification was required for employees, and keys or access cards were provided to police and fire departments.

School Safety Drills

Best practices include accounting for all students during school safety drills, conducting drills with local law enforcement agencies or emergency responders, debriefing drill results, and writing comprehensive drill evaluations.

At each school building that is regularly occupied by students, statutes require school districts and private schools to annually conduct at least one drill in the proper response to a school violence event, in accordance with the school safety plan in effect for a given school building. Drills provide the opportunity to test emergency procedures, improve responses, and guide the contents of plans. We reviewed written drill evaluations submitted to DOJ. Best practices include:

- accounting for all students during drills;
- conducting drills with local law enforcement agencies or emergency responders;
- debriefing drill results; and
- writing comprehensive drill evaluations.

It is a best practice for school safety drills to accurately and efficiently account for all students. Our review found that one private school and one school district had positive experiences using electronic communications applications that helped take and report attendance, while other schools indicated that they had effectively used class rosters and traditional attendance methods. At a number of schools, the drills revealed that some teachers were uncertain about how to report attendance, and the evaluations provided opportunities to review these procedures and provide teachers with additional guidance.

Conducting school safety drills with local law enforcement agencies or first responders strengthens working relationships and creates opportunities to share information. Our review found that law enforcement officers were involved with a number of drills. For example:

- One school district's active shooter drill included a 911 call and the arrival of municipal police officers, sheriff deputies, and medical first responders.
- A second school district's active shooter drill involved law enforcement officers who opened locked classroom doors and led employees and students from the school to a designated evacuation site.
- A third school district's bomb threat drill involved a neighboring county's bomb-sniffing dog that was dispatched to a school.

Debriefing the results of a school safety drill with employees and students maximizes the effectiveness of the drill and provides an opportunity to immediately address questions and concerns. Our review found that different types of debriefing sessions were held, including those involving administrators, teachers, law enforcement officers, and students. For example, one public school indicated that teachers discussed six questions with students after an active shooter drill, which revealed that students either chose not to use or were unaware of all available school building exit routes. In response, the school planned to give building tours to students.

Producing written drill evaluations that identify strengths and weaknesses can inform school boards and governing bodies about the procedures that employees and students executed well and those that may need to be modified or further practiced. Our review found many school districts and private schools modeled their drill evaluations on a DOJ-provided template. After a drill, one public school surveyed its employees and collected more than 80 comments on what went well and what else could be done to prepare for future emergencies.

School Building Blueprints

Best practices include ensuring that school building blueprints indicate certain information and are well-organized and clear.

Statutes require school districts and private schools to submit school building blueprints to local law enforcement agencies and DOJ. Blueprints provide information that helps law enforcement agencies and emergency responders better understand building features, which can save time during emergencies. We reviewed the blueprints submitted to DOJ. Best practices include ensuring that blueprints indicate certain information, such as access points and security features, and are well-organized and clear.

Blueprints that indicate access points, room labels, surveillance and security features, and relevant areas outside of school buildings can help law enforcement agencies plan for and respond to emergencies. Our review found that a number of blueprints included such information. For example:

- Multiple blueprints displayed precise markings for access points and indicated windows and single- and double-door entryways.
- Multiple blueprints included unique room numbers and descriptions, athletic fields, playgrounds, parking areas, fences, evacuation routes, and shelter areas.

- Multiple blueprints indicated security features, such as doors that can be opened only with access cards, intercom terminals, fire extinguishers, automated external defibrillators, utility shut-offs, locations of hazardous materials, and classrooms and common areas with security cameras.

Blueprints benefit from having a legend, color-coding, and clean lines to avoid misinterpretations or concealment of necessary details, such as room locations. Our review found examples of well-organized and clear blueprints that had been produced by professional architectural software and that identified features such as wall and door boundaries, room numbers, installed seating, automated external defibrillator locations, and stairways. Our review also found examples of well-organized and clear blueprints that had been produced by word processing programs and that used color-coding and shapes to identify features such as doors and room purposes. Some school districts used blueprints that incorporated multiple layers of information, which allows individuals to more readily identify particular types of security and safety features, such as emergency telephone locations, access points, evacuation routes, utility shut-offs, fire extinguishers, and storage areas for hazardous materials.

Other Considerations

We identified several strategies that school districts and schools can use to increase the effectiveness of their school safety plans.

In addition to the examples of school safety best practices, we identified several strategies that school districts and schools can use to increase the effectiveness of their school safety plans. We identified these strategies through our review of the 779 school safety plans and related documents that school districts and schools had submitted to DOJ, our review of school safety documents from around the nation, and our discussions with groups interested in school safety issues.

The effectiveness of school safety plans can be increased if school administrators make improvements to these plans based on school safety assessments and the written evaluations of school safety drills. For example, a drill evaluation may reveal that certain aspects of a given plan worked more effectively than others. As a result, a plan may need to be supplemented with additional information, such as by providing teachers and students with more-detailed guidance on how to evacuate a school building more quickly when incidents occur.

The effectiveness of school safety plans can be increased if the plans reflect the particular circumstances of a given school. Each school has unique safety needs, physical characteristics, student populations, and surrounding environments. Over time, these

circumstances may change, which may necessitate modifications to a given plan. As noted, a template provides a standardized framework for creating a plan, but it is not as useful if school officials overly rely on it and exclude unique information relevant to a given school.

The effectiveness of school safety plans can be increased if all aspects of incidents are addressed, including the actions that should be taken before and after the incidents occur. Although it is important for plans to contain sufficient information for responding effectively to incidents that occur, it is similarly important for plans to contain relevant information about preventing, mitigating, and preparing for incidents, as well as for recovering from them.

The effectiveness of school safety plans can be increased if the plans address multiple types of incidents. Incidents that involve violence committed by individuals receive considerable attention and cause understandable concern. However, interpersonal conflicts, natural disasters, accidents, and other types of incidents may be more likely to occur than, for example, an armed intruder entering a school building. As a result, it is important for plans to address these types of incidents as well.

■ ■ ■ ■

Opinions of School Districts, Schools, and Local Law Enforcement Agencies ■

We surveyed school districts, schools, and local law enforcement agencies about school safety issues.

We surveyed 1,210 administrators of all school districts, private schools, independent charter schools, and tribal schools for which DPI had contact information, as well as 521 local law enforcement agencies, about school safety issues. A total of 427 administrators of school districts and schools (35.3 percent) and 331 local law enforcement agencies (63.5 percent) responded to our two surveys. Not all respondents answered each question. Most school administrators who responded indicated they were satisfied with the cooperation they received from external entities when they created school safety plans and with the school safety grants and the training provided by DOJ. Most school administrator respondents also indicated that they had unmet school safety needs. Local law enforcement agencies that responded to our survey indicated that they were more satisfied with various aspects of school safety at school districts than at private schools.

School Districts and Schools

The 427 school administrator respondents do not correspond to 427 school districts and schools because some administrators oversaw multiple school districts or schools. The 427 respondents included 222 private school respondents, 201 school district respondents, 2 independent charter school respondents, and 2 tribal school respondents. Survey respondents were located in 68 counties.

A total of 92.7 percent of respondents indicated they had submitted a school safety plan to DOJ.

School Safety Plans

Survey respondents indicated if they had submitted a school safety plan to DOJ as of our July 2019 survey, including:

- 396 respondents (92.7 percent of the 427 respondents) who indicated that they had submitted a plan, including 199 school district respondents, 194 private school respondents, 2 independent charter school respondents, and 1 tribal school respondent; and
- 31 respondents (7.3 percent) who indicated that they had not submitted a plan, including 28 private school respondents, 2 school district respondents, and 1 tribal school respondent.

As noted, statutes require school safety plans to be created with the active participation of appropriate entities. Such entities may include DOJ; DPI, which can provide school districts and schools with guidance and support on a variety of issues, including developing a positive school climate; local law enforcement officers; firefighters; teachers; pupil services professionals, such as school counselors and social workers; and mental health professionals. Survey respondents indicated their satisfaction with the cooperation they received from such entities when creating their plans.

Most school district and private school respondents were satisfied with the cooperation of other entities when developing their school safety plans.

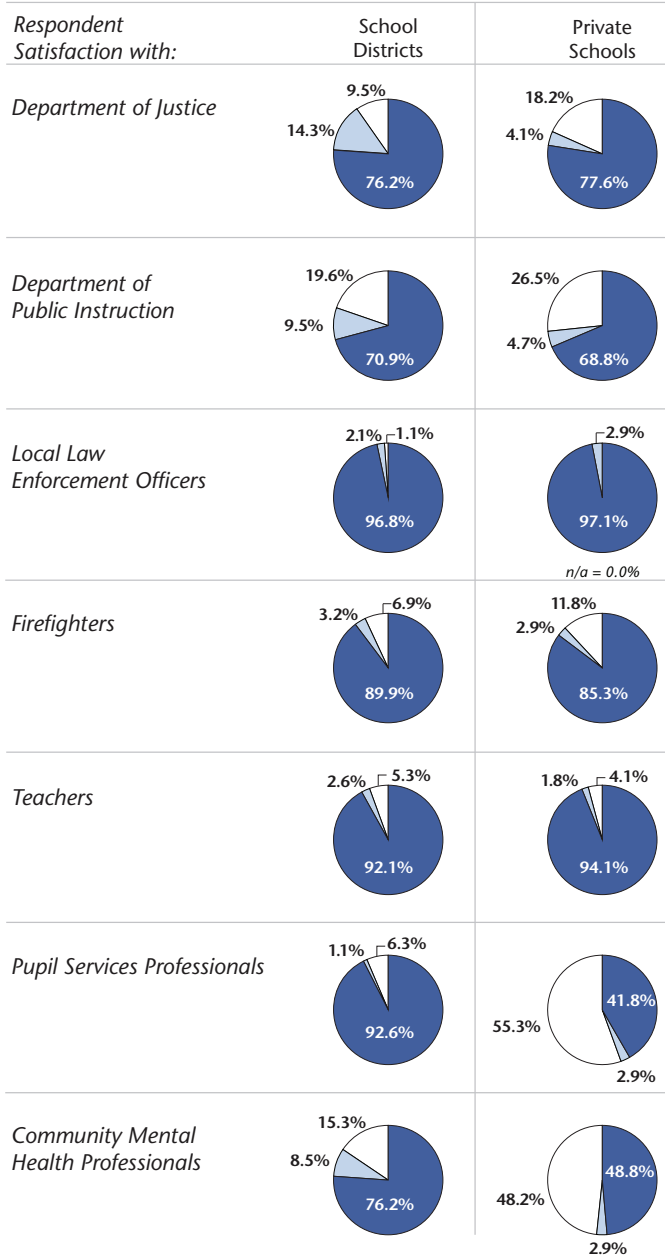
As shown in Figure 4, most school district and private school respondents were satisfied with the cooperation of other entities when developing their school safety plans. Private school respondents were considerably less likely than school district respondents to have cooperated with pupil services professionals and community mental health professionals.

Figure 4

Satisfaction of School Districts and Private Schools with the Cooperation of Other Entities in Developing School Safety Plans¹

School District Respondents (189) Private School Respondents (170)

■ Satisfied ■ Dissatisfied □ Not Applicable



¹ As indicated by survey respondents. School district respondents include two independent charter school respondents, and private school respondents include one tribal school respondent.

Survey respondents estimated their costs to develop school safety plans, including staff time and other expenses. A total of 281 respondents answered this question, including:

- 97 respondents (34.5 percent) who estimated their costs were \$500 or less;
- 37 respondents (13.2 percent) who estimated their costs were between \$501 and \$1,000;
- 82 respondents (29.2 percent) who estimated their costs were between \$1,001 and \$5,000;
- 37 respondents (13.2 percent) who estimated their costs were between \$5,001 and \$10,000; and
- 28 respondents (10.0 percent) who estimated their costs were more than \$10,000.

School Safety Grants

As noted, DOJ awarded \$94.5 million in school safety grants in two rounds of funding in 2018. Survey respondents indicated whether they had applied for and received school safety grants in round 1, including:

- 300 respondents (76.9 percent of 390 respondents) who indicated they had applied for grants, and 96.3 percent of these respondents indicated they had received them; and
- 90 respondents (23.1 percent) who indicated they had not applied for grants.

Most survey respondents were satisfied with various aspects of their round 1 school safety grants.

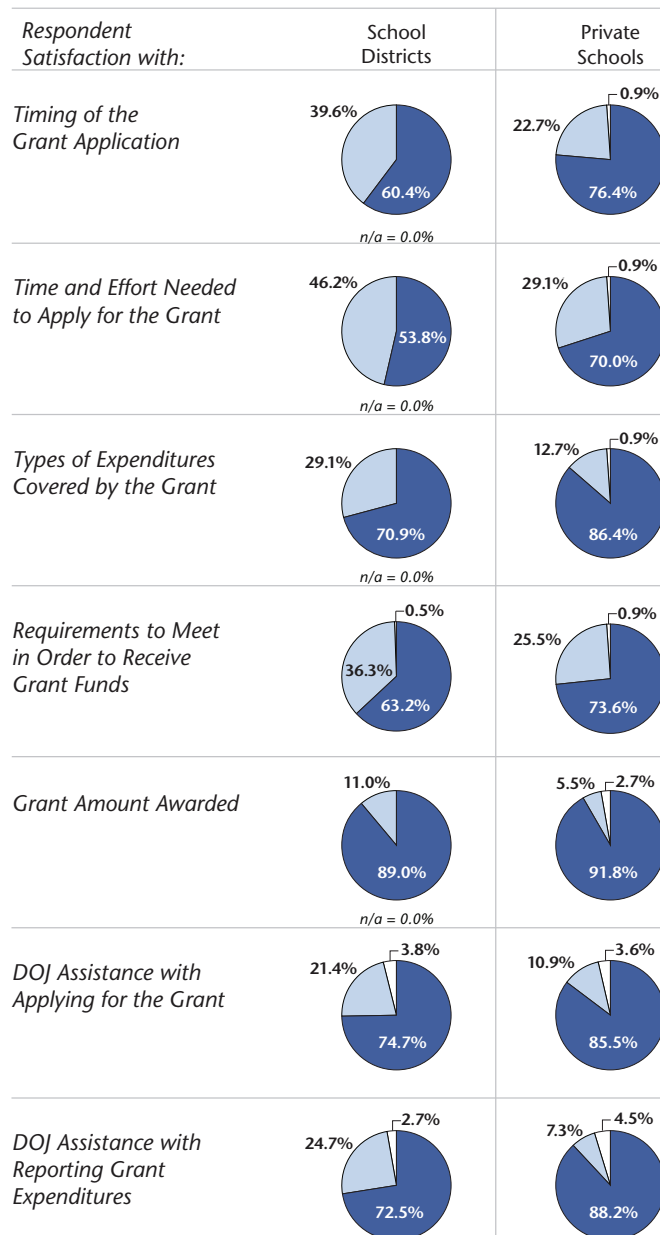
As shown in Figure 5, most survey respondents were satisfied with various aspects of their round 1 school safety grants. However, more than one-third of school district respondents indicated dissatisfaction with several aspects, including the timing of the grant application, the time and effort needed to apply for a grant, and the requirements they needed to meet in order to receive grant funds. DOJ noted that the timing of the grants was determined by the enactment of 2017 Wisconsin Act 143 in March 2018.

Figure 5

Satisfaction of School Districts and Private Schools with Certain Aspects of Round 1 School Safety Grants¹

School District Respondents (182) Private School Respondents (110)

■ Satisfied ■ Dissatisfied □ Not Applicable



¹ As indicated by survey respondents. School district respondents include one independent charter school respondent, and private school respondents include one tribal school respondent.

Survey respondents indicated whether they had applied for and received school safety grants in round 2, including:

- 249 respondents (65.4 percent of 381 respondents) who indicated they had applied for grants, and 99.2 percent of these respondents indicated that they had received them; and
- 132 respondents (34.6 percent) who indicated they had not applied for grants.

Most survey respondents were satisfied with various aspects of their round 2 school safety grants.

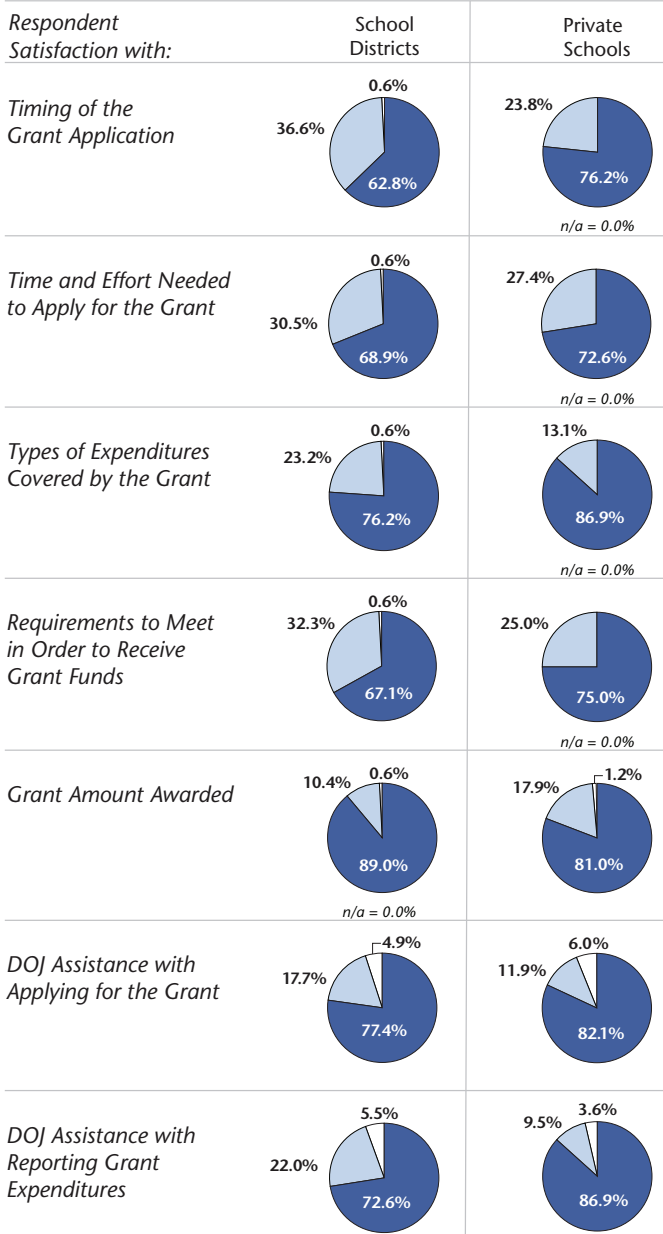
As shown in Figure 6, most survey respondents were satisfied with various aspects of their round 2 school safety grants. However, approximately one-third of school district respondents indicated dissatisfaction with the timing of the grant application, the time and effort needed to apply for a grant, and the requirements they needed to meet in order to receive grant funds. In addition, school districts indicated lower levels of dissatisfaction with these aspects of the round 2 grants, compared to similar aspects of the round 1 grants.

Figure 6

Satisfaction of School Districts and Private Schools with Certain Aspects of Round 2 School Safety Grants¹

School District Respondents (164) Private School Respondents (84)

■ Satisfied ■ Dissatisfied □ Not Applicable



¹ As indicated by survey respondents. School district respondents include one independent charter school respondent, and private school respondents include one tribal school respondent.

Private school respondents were typically more satisfied than school district respondents with various aspects of both rounds of school safety grants.

Private school respondents were typically more satisfied than school district respondents with various aspects of both rounds of school safety grants. Both types of respondents were generally most satisfied with the grant amounts awarded, the types of expenditures covered by the grants, and the assistance they received from DOJ. Survey respondents were less satisfied with the timing of the grant applications, the time and effort needed to apply for the grants, and requirements to meet in order to receive grant funds. These three aspects were also the most-common reasons indicated by survey respondents for not applying for school safety grants.

A number of survey respondents indicated that they appreciated receiving school safety grants. For example:

- One respondent indicated that “we are very appreciative of the funding we received to make important safety improvements to our buildings and to provide vital staff training.”
- A second respondent indicated that “we feel the money awarded in the grants will help us in keeping our students safe while attending school.”
- A third respondent indicated that “we were pleased that all the private schools were included in the chance to obtain the safety grants. It was the only source of funding for the needed safety updates.”

Other survey respondents commented negatively on certain aspects of the school safety grants. For example:

- Some respondents indicated dissatisfaction with the complexity and number of application and reporting requirements to receive grant funding, including one who indicated that “applying for this safety grant was a huge undertaking for a school of our size which heavily relies upon volunteers and donations...” and another who indicated that “the reporting process is cumbersome, and changes were made to the reporting documents after our initial submissions. These changes in formatting were frustrat[ing] and time consuming.”
- Other respondents indicated dissatisfaction with the timing of the grant applications, including one

who indicated that “both grants were due at exceptionally busy times of the school year; the first at the end of the school year and the second at the start of the school year.”

- Still other respondents indicated dissatisfaction with the types of expenditures that were eligible for grant funding, including one who indicated a desire for “more freedom to choose the security improvements needed by individual schools.”

School Safety Training

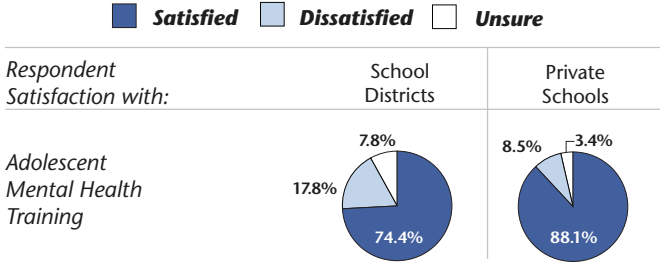
Most respondents to our survey were satisfied with the adolescent mental health training provided by DOJ.

Survey respondents indicated whether they had attended the adolescent mental health training provided by DOJ. As noted, applicants for round 2 school safety grants were required to send 10.0 percent of full-time teachers and counselors to a 12-hour DOJ-approved adolescent mental health training program. A total of 378 respondents answered this question, including 188 respondents (49.7 percent) who indicated that individuals from their school districts and schools had attended this training. As shown in Figure 7, most respondents were satisfied with this training.

Figure 7

Satisfaction of School Districts and Private Schools with the Adolescent Mental Health Training Provided by DOJ¹

School District Respondents (129) Private School Respondents (59)



¹ As indicated by survey respondents.

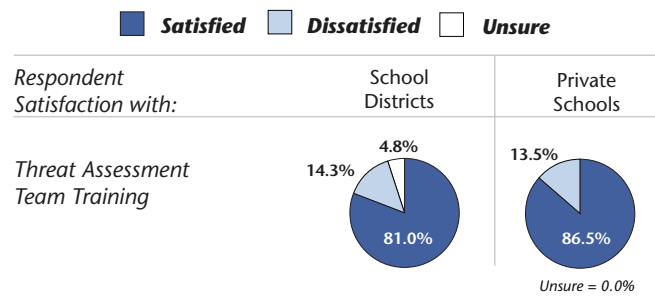
Most survey respondents were satisfied with the threat assessment team training provided by DOJ.

Survey respondents also indicated whether they had attended the threat assessment team training provided by DOJ. Applicants for round 2 school safety grants were required to create a school safety intervention team that includes one individual who had attended the threat assessment team training provided by DOJ. Survey respondents indicated whether individuals from their school districts and schools had attended this training. A total of 377 survey respondents answered this question, including 221 respondents (58.6 percent) who indicated someone from their school districts or schools had attended this training. As shown in Figure 8, most respondents were satisfied with this training.

Figure 8

Satisfaction of School Districts and Private Schools with the Threat Assessment Team Training Provided by DOJ¹

School District Respondents (147) Private School Respondents (74)



¹ As indicated by survey respondents. School district respondents include one independent charter school respondent.

Some survey respondents commented on their satisfaction with both types of school safety training provided by DOJ. For example:

- One respondent indicated that the training was “very professional, effective, and useful.”
- Another respondent indicated that “we appreciate the availability and low cost of the training opportunities. Very helpful and convenient.”

Other survey respondents commented on their dissatisfaction with the location, availability, and content of the training. For example:

- One respondent indicated that “there are limited seats at locations near to our school...”

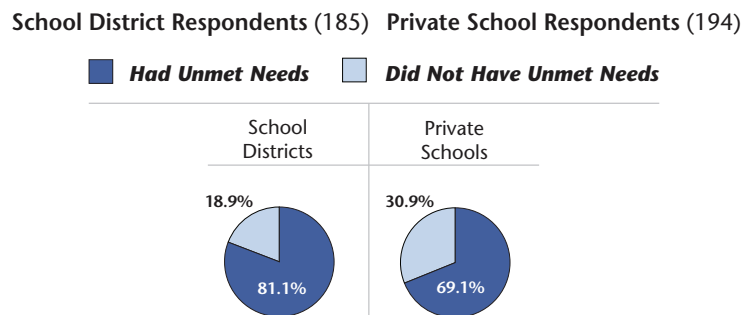
- A second respondent indicated that “we need more trainings in the summer and on Saturdays during the school year. It is very hard to find substitute teachers in rural areas...”
- A third respondent indicated that “the information provided was somewhat redundant with information we already share with our school staff.”

School Safety Needs

Survey respondents indicated whether they have unmet school safety needs. As shown in Figure 9, 81.1 percent of school district respondents and 69.1 percent of private school respondents indicated that they have unmet safety needs.

Figure 9

School Districts and Private Schools with Unmet School Safety Needs¹



¹ As indicated by survey respondents. School district respondents include two independent charter school respondents, and private school respondents include two tribal school respondents.

Some survey respondents provided information about their unmet school safety needs. For example:

- 113 respondents indicated a need for more improvements to secure doors and windows, such as upgraded door locks and shatter-resistant film;
- 98 respondents indicated a need for additional security cameras and surveillance capabilities;

- 71 respondents indicated a need for more secure school entrances and vestibules;
- 40 respondents indicated a need for school resource officers or police liaison officers;
- 32 respondents indicated a need for additional communication systems, such as public address systems and two-way radios;
- 30 respondents indicated a need for additional funding for school safety-related training; and
- 25 respondents indicated a need for additional mental health services employees and access to mental health providers in the community.

Local Law Enforcement Agencies

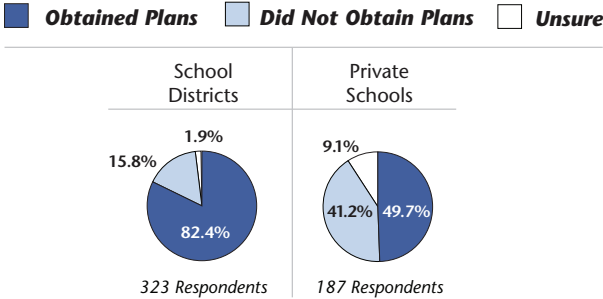
We surveyed 521 local law enforcement agencies in Wisconsin, including 449 municipal police departments and 72 county sheriff offices. A total of 331 law enforcement agencies (63.5 percent) in 70 counties responded, including 299 municipal police departments and 32 county sheriff offices. Each law enforcement agency is located within the boundary of at least one school district, and 184 respondents (55.6 percent) indicated that their jurisdictions contain at least one private school.

Most survey respondents indicated that they had obtained school safety plans from school districts and private schools.

As shown in Figure 10, most survey respondents indicated that they had obtained school safety plans from school districts and private schools. A total of 82.4 percent of respondents indicated that they had obtained plans from one or more school districts, and 49.7 percent of respondents with private schools in their jurisdictions indicated that they had obtained plans from one or more private schools.

Figure 10

Extent to Which Local Law Enforcement Agencies Obtained School Safety Plans from School Districts and Private Schools¹
Since March 2018



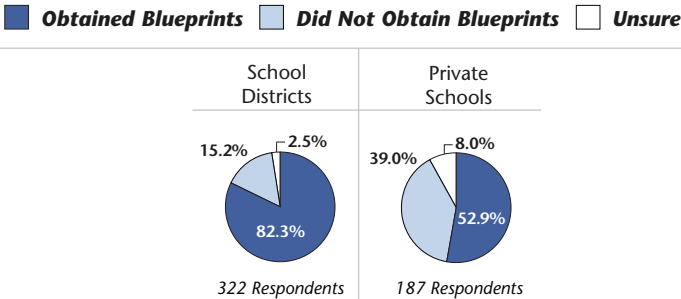
¹ As indicated by survey respondents.

Most survey respondents indicated that they had obtained school building blueprints from school districts and private schools.

As noted, statutes require school districts and private schools to submit school building blueprints to each local law enforcement agency with jurisdiction over them. As shown in Figure 11, most survey respondents indicated that they had obtained blueprints from school districts and private schools. A total of 82.3 percent of respondents indicated that they had obtained blueprints from one or more school districts, and 52.9 percent of respondents with private schools in their jurisdictions indicated that they had obtained blueprints from one or more private schools.

Figure 11

Extent to Which Local Law Enforcement Agencies Obtained School Building Blueprints from School Districts and Private Schools¹
Since March 2018



¹ As indicated by survey respondents.

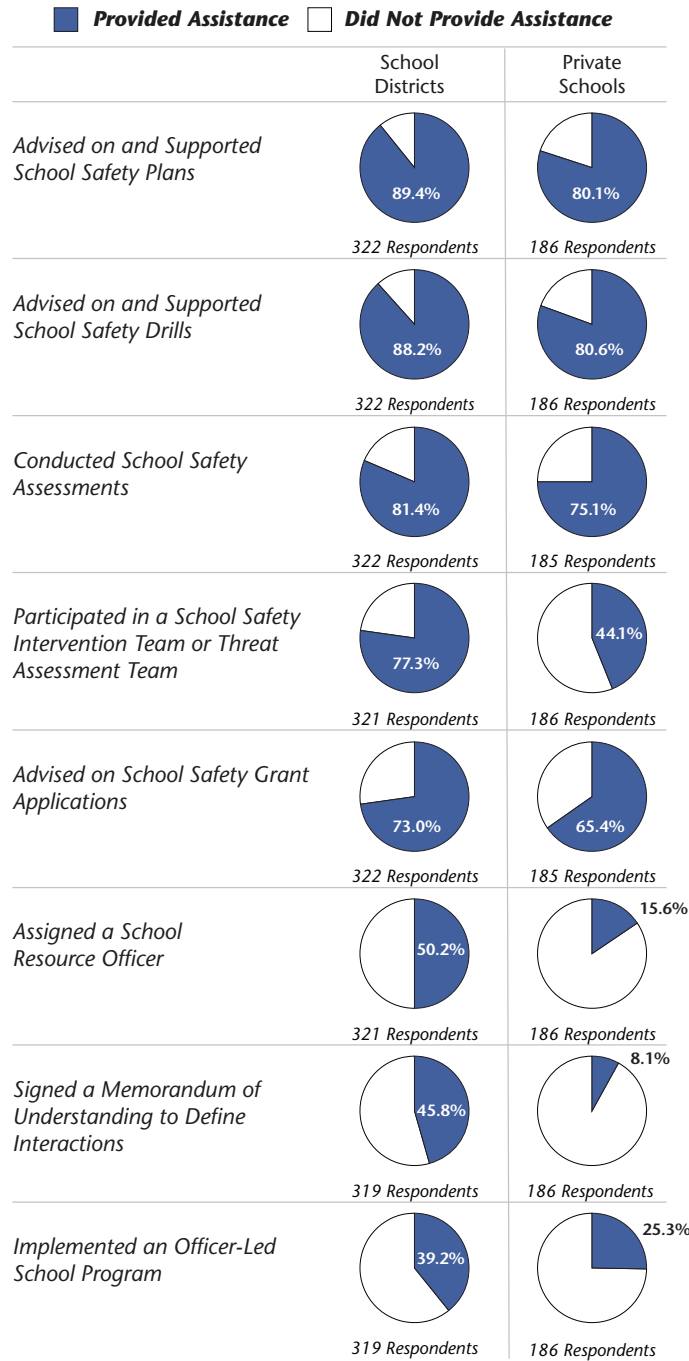
A number of survey respondents provided suggestions for developing school building blueprints in ways that would assist law enforcement agencies during emergencies. For example:

- Respondents suggested that blueprints identify windows and doors, teacher names and subjects taught in classrooms, evacuation routes, meeting points, shelter locations, medical supply locations, utility shut-offs, and areas with security camera coverage. Many respondents also suggested that blueprints should identify compass directions, the types of construction materials and locking mechanisms of exterior doors, and the best entrances for law enforcement officers to use during emergencies.
- Respondents suggested that blueprints be maintained electronically, such as in a computer-aided design program, rather than be scanned or photocopied from architectural blueprints. One respondent indicated that digital blueprints are easier to update to reflect changes to structures and security features.
- Respondents suggested using commercially-available incident response command and control tools that digitally integrate blueprints with overhead imagery and visual references, which help provide situational awareness for emergency responders.

We asked local law enforcement agencies about the types of school safety assistance they had provided to school districts and private schools since March 2018. As shown in Figure 12, survey respondents indicated that advising on and supporting school safety plans and school safety drills were the two most-common types of assistance they had provided. Respondents indicated that they were more likely to have provided each type of assistance to school districts than to private schools.

Figure 12

Types of School Safety Assistance That Local Law Enforcement Agencies Provided to School Districts and Private Schools¹
 Since March 2018



¹ As indicated by survey respondents.

Survey respondents indicated that they had communicated more frequently with school districts than with private schools.

We asked local law enforcement agencies about their communication with school districts and private schools regarding school safety since March 2018. Survey respondents indicated that they had communicated more frequently with school districts than with private schools, and that school districts were more likely than private schools to initiate contact. It is a best practice for local law enforcement agencies to share certain information with schools, such as arrests, deaths, or other traumatic events involving students and their families. Sharing such information can allow school employees to appropriately engage with the relevant students and provide additional support to them as necessary. Survey respondents indicated that they more frequently shared such information with school districts than with private schools.

We asked local law enforcement agencies that indicated they had private schools in their jurisdictions about their level of involvement with them since March 2018. Among the 191 respondents:

- 102 respondents (53.4 percent) indicated that they had more involvement with school districts than with private schools;
- 12 respondents (6.3 percent) indicated that they had more involvement with private schools than with school districts; and
- 77 respondents (40.3 percent) indicated that they had equal involvement with school districts and private schools.

Local law enforcement agencies estimated their costs of working with school districts and private schools on school safety issues since March 2018, including staff time and other expenses. Among the 310 respondents:

- 93 respondents (30.0 percent) estimated their costs were \$500 or less;
- 50 respondents (16.1 percent) estimated their costs were between \$501 and \$1,000;
- 93 respondents (30.0 percent) estimated their costs were between \$1,001 and \$5,000;
- 28 respondents (9.0 percent) estimated their costs were between \$5,001 and \$10,000; and
- 46 respondents (14.8 percent) estimated their costs were more than \$10,000.

Survey respondents were more satisfied with various aspects of school safety at school districts than at private schools.

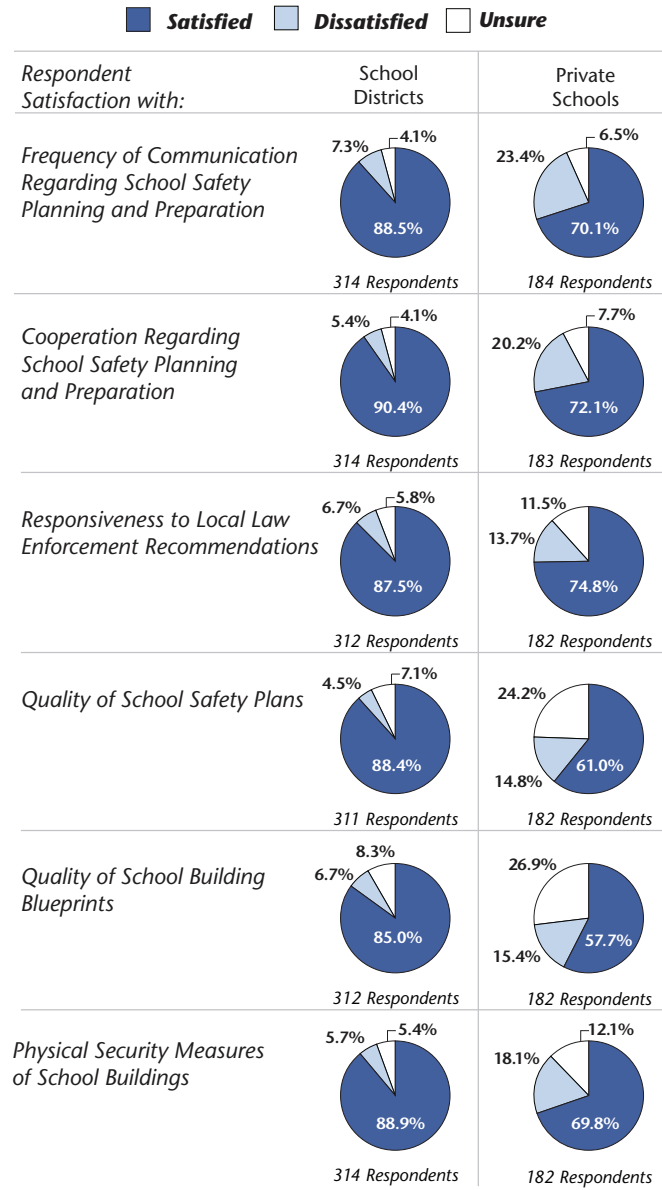
As shown in Figure 13, survey respondents were more satisfied with various aspects of school safety at school districts than at private schools. Approximately 85.0 percent or more of respondents were satisfied with each aspect of school safety at school districts, and approximately 60.0 percent or more of respondents were satisfied with each aspect of school safety at private schools.

A number of survey respondents provided additional information about school safety. For example:

- Respondents noted that law enforcement agencies and school administrators should build a productive working relationship by establishing points of contact, regularly discussing issues, and proactively engaging in school safety planning.
- Respondents offered suggestions for making school safety training and drills more effective, including by operating drills involving both locking down some classrooms and evacuating others, training employees on common issues such as evacuations and handling disruptive students, and holding drills at lunch and in the morning before a school day begins.

Figure 13

Satisfaction of Local Law Enforcement Agencies with Aspects of School Safety at School Districts and Private Schools¹
Since March 2018



¹ As indicated by survey respondents.

Assessing Survey Results

Most school administrators who responded to our survey indicated that they were satisfied with the cooperation they received from DOJ when creating their school safety plans, the school safety grants, and the training provided by DOJ. However, some respondents indicated dissatisfaction. For example:

- approximately 20.0 percent of school district respondents and approximately 10.0 percent of private school respondents were dissatisfied with DOJ's assistance in applying for round 2 grants and in reporting round 2 grant expenditures; and
- approximately 15.0 percent of school district respondents and approximately 10.0 percent of private school respondents were dissatisfied with DOJ's adolescent mental health training and with DOJ's threat assessment team training.

Law enforcement agencies that responded to our survey indicated that they were more likely to have assisted school districts than private schools with school safety plans and other types of school safety issues. Similarly, survey respondents indicated that they had communicated more frequently with school districts than with private schools and that they were more satisfied with various aspects of school safety at school districts than at private schools. These responses may indicate that some private schools could benefit from additional support with school safety issues.

As noted, statutes require DOJ to create model practices for school safety and provide school safety training to school staff or contract with a third party to provide this training. To help further fulfill these statutory responsibilities, DOJ should use the results of our surveys to consider ways to provide school districts and schools with additional training and support for school safety issues. For example, the survey results can help DOJ consider additional ways to support the development of effective school safety plans and foster cooperation between local law enforcement agencies and school districts and schools. In addition, DOJ could consider ways to ensure that private schools receive additional support pertaining to school safety issues.

Recommendation

We recommend the Department of Justice:

- *use the results of our surveys of school administrators and local law enforcement agencies to consider ways to provide school districts and schools with additional training and support for school safety issues; and*
- *report to the Joint Legislative Audit Committee by April 24, 2020, on its efforts to implement this recommendation.*

■ ■ ■ ■

Appendix ■

Appendix

Selected Documents Related to School Safety Best Practices

Organized by the Types of Entities that Developed the Documents

Wisconsin State Agencies

Wisconsin Comprehensive School Security Framework

Wisconsin Department of Justice

https://www.doj.state.wi.us/sites/default/files/school-safety/WI_School_Safety_framework.pdf

Wisconsin School Threat Assessment Protocol

Wisconsin Department of Justice

https://www.doj.state.wi.us/sites/default/files/school-safety/WI_School_Threat_Assessment_Protocol.pdf

Considerations for Drill Design at Your School

Wisconsin Department of Justice

https://www.doj.state.wi.us/sites/default/files/school-safety/drill_considerations%281%29.docx

Safe Schools Legal Resource Manual

Wisconsin Department of Justice

<https://www.doj.state.wi.us/sites/default/files/school-safety/safe-schools-manual-2016.pdf>

Safe Schools

Wisconsin Department of Public Instruction

<https://dpi.wi.gov/sspw/safe-schools>

The Wisconsin Department of Justice's website links to other school safety resources

<https://www.doj.state.wi.us/office-school-safety/school-safety-resources>

Federal Agencies and Entities

Guide for Developing High-Quality School Emergency Operations Plans

Federal Bureau of Investigation, Federal Emergency Management Agency, and the federal departments of Education, Health and Human Services, Homeland Security, and Justice

https://rems.ed.gov/docs/REMS_K-12_Guide_508.pdf

Final Report of the Federal Commission on School Safety

Federal Commission on School Safety

<https://www2.ed.gov/documents/school-safety/school-safety-report.pdf>

Creating Emergency Management Plans

Department of Education

<https://rems.ed.gov/docs/CreatingPlans.pdf>

Sample School Emergency Operations Plan

Federal Emergency Management Agency

<https://training.fema.gov/programs/emischool/el361toolkit/assets/sampleplan.pdf>

Other States

Comprehensive School Safety Guide

Minnesota Department of Public Safety

<https://dps.mn.gov/divisions/hsem/mn-school-safety-center/Documents/Comprehensive%20School%20Safety%20Guide.pdf>

School Facility Self-Assessment Checklist

Minnesota Department of Public Safety

<https://dps.mn.gov/divisions/hsem/mn-school-safety-center/Documents/safe-school-facility-self-assessment-checklist.pdf>

School Safety Assessment

Georgia Department of Education

<https://www.gadoe.org/schoolsafetyclimate/Documents/School%20Safety%20Assessment.pdf>

2018 Indiana School Safety Recommendations

Indiana Department of Homeland Security and Indiana Department of Education

<https://www.in.gov/dhs/files/2018-Indiana-School-Safety-Recommendations.pdf>

2016 School Safety Inspection Checklist for Virginia Public Schools

Virginia Department of Education and Virginia Department of Criminal Justice Services

https://www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/publications/law-enforcement/school-safety-inspection-checklist_0.pdf

Other Organizations

The Standard Response Protocol K12

“I Love U Guys” Foundation

<https://iloveuguyys.org/srp/SRP%20K12%20Operation%20Guidelines%202015.pdf>

Emergency Operations Plan Template

Wisconsin School Safety Coordinators Association

https://www.doj.state.wi.us/sites/default/files/school-safety/WSSCA_EOP_Template_Model_June2019.docx

Best Practice Considerations for Schools in Active Shooter and Other Armed Assailant Drills

National Association of School Psychologists and National Association of School Resource Officers

<https://nasro.org/cms/wp-content/uploads/2014/12/Best-Practice-Active-Shooter-Drills.pdf>

Response ■



**STATE OF WISCONSIN
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December 17, 2019

Joe Chrisman, State Auditor
Legislative Audit Bureau
22 E. Mifflin Street, Suite 500
Madison, WI 53703

Dear Mr. Chrisman:

The Wisconsin Department of Justice (DOJ) would like to thank the Legislative Audit Bureau (LAB) for the opportunity to participate in the review of the functions of the Office of School Safety (OSS). DOJ appreciates LAB's feedback.

LAB's report concludes that DOJ has "appropriately administered and overs[een]" the school safety grants. The report correctly explains that \$94.5 million was awarded through 1,325 school safety grants to school districts, private schools, independent charter schools, and tribal schools. As of the date of this letter, OSS has reimbursed \$60.7 million of expenditures made pursuant to those awards and 19% of school safety grants have been closed.

Notably, OSS has been able to make this progress—and to take other steps to promote school safety—despite the fact that 2017 Wis. Act 143, which created OSS, only authorized one FTE position for that office. OSS has accomplished its work in large part through additional FTE positions that were moved to OSS from within DOJ and through the use of LTEs.

OSS's vision is to "help Wisconsin build the safest schools in the nation." While grant administration is an important function of OSS, that office provides other important resources related to that vision. OSS worked with the Office of School Safety Advisory Committee, subcommittees, and partners to identify three items that warranted attention in order to help make Wisconsin's schools safer:

- A Comprehensive School Security Framework;
- A School Threat Assessment Protocol; and
- A Resource Center/Confidential Threat Reporting System

Comprehensive School Security Framework

The School Security Framework provides a comprehensive set of policies, practices, and procedures to help guide local efforts to prevent, mitigate, prepare for, respond to, and recover from violence. The framework provides best practices for preventing violence through climate and culture, student engagement, school policies, and physical structure. The framework also provides guidance on assessing potential indicators of violence and diverting identified hazards before violence takes place. In the event that violence does occur, the framework addresses how proper planning, preparation, and training can minimize the severity of the incident and help the school recover more quickly.

School Threat Assessment Protocol

2017 Wisconsin Act 143 required OSS to provide best practice guidance to schools around the state. The Wisconsin School Threat Assessment Protocol is an important part of that guidance. This protocol was developed to assist school safety professionals in identifying students who may present a concern so their behaviors can be addressed before an incident occurs. This guide focuses on one of the most important school violence prevention tools, the school-based threat assessment, which can be applied as an early intervention tool. A well-designed threat assessment protocol should help identify students that need additional resources.

Resource Center/Confidential Threat Reporting System

OSS has been working to establish a statewide, confidential threat reporting system. It recently received \$200,000 in federal grant funding to help pay for the technology needed to do so. A resource center will allow OSS to collect detailed data regarding the types of threats reported in the state, what type of assistance is being requested from OSS, and where future grant funding and training could be best directed.

Additional Support for School Safety

OSS offers its expertise to schools across the state in other ways as well, including:

- **Training:** OSS has given presentations and provided trainings to a number of organizations and schools across the state. Trainings have primarily focused on juvenile and adolescent mental health and school violence threat assessment.

- **Technical Assistance/Consultation:** Several school districts have requested consultations with OSS regarding specific safety concerns and threat assessments. In addition, OSS regularly responds to inquiries regarding policy, procedures, and best practices.
- **School Critical Incident Response Teams:** OSS has assisted schools experiencing critical incidents and security concerns. OSS has been able to provide both on-site and remote critical incident response, best practice guidance, and threat assessment consultation.

OSS is currently considering ways to work with schools to develop school threat assessment teams and annual school climate and culture surveys.

Audit Survey Responses

Surveys conducted by LAB as part of the audit indicate that, while grant funds have helped schools improve building safety, unmet safety needs still exist: 81.1% of school districts and 69.1% of private schools identified unmet safety needs. As these survey results reflect, a great deal of work remains to be done. The LAB report recommends that DOJ use the survey results to consider ways to provide schools with additional training and support for school safety issues. DOJ takes this recommendation from LAB seriously, and it will continue looking for additional ways to meet the needs of our schools and to enhance school safety. DOJ notes that, with an additional investment of staff and resources, OSS would be in an even better position to address the needs identified by survey respondents.

Legislative Considerations

DOJ agrees with the “Legislative Considerations” outlined by LAB in the report, namely: (1) requiring independent charter schools to develop school safety plans and submit them to DOJ; (2) requiring school safety plans to be submitted to DOJ every three years; and (3) requiring DOJ to annually review a sample of the school safety plans. DOJ sees particular benefit in the third consideration, but it will take an additional investment in OSS to maximize its impact.

LAB Recommendations

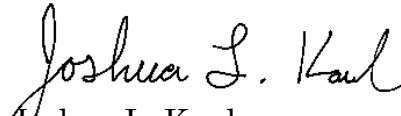
- ***Use the results of our surveys of school administrators and local law enforcement agencies to consider ways to provide school districts and schools with additional training and support for school safety issues.***
 - DOJ Response: DOJ welcomes the opportunity to explore additional ways in which OSS can provide additional training and support on school safety issues.

- ***Report to the Joint Legislative Audit Committee by April 24, 2020, in its efforts to implement their recommendation.***
 - DOJ Response: DOJ supports this recommendation.

Summary

DOJ appreciates LAB's thorough review of OSS. In less than two years, OSS has taken a number of important steps to help make Wisconsin's schools safer. I encourage members of the State Legislature to consider additional investments in OSS as it continues pursuing its vision of "help[ing] Wisconsin build the safest schools in the nation."

Sincerely,


Joshua L. Kaul
Attorney General

JLK:CJM:alm